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Attorneys for Plaintiff- SONJI M. ASTORGA

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	DOCKET No.: 16-cv-5068

--X

SONJI M. ASTORGA,

                    Plaintiff,

     -against-

ALLSTATE OIL RECOVERY, CO. and
RICHARD J. WOODHAM,

                  Defendants.

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NOTICE OF MOTION FOR PARTIAL SUMMARY JUDGMENT ON THE ISSUE OF LIABILITY

Referred to the Honorable Sarah Netburn, United States Magistrate Judge

PLEASE TAKE NOTICE, that upon the annexed affirmation of EDWARD A. STEINBERG, ESQ. duly affirmed on December 13, 2017, together with the exhibits annexed thereto, and upon all the pleadings and proceedings heretofore had herein, the undersigned will move this Court located at Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007 as soon as counsel can be heard for an Order, pursuant to Rule 56 of the Federal Rules of Civil Procedure:

1) Granting plaintiff SONJI M. ASTORGA partial summary judgment on the issue of liability as against the defendants ALLSTATE OIL RECOVERY, CO. and RICHARD J. WOODHAM;

2) Setting this matter down for a trial on the issue of damages only;

3) Such other and further relief, which to this Court seems just and proper.

PLEASE TAKE FURTHER NOTICE, that answering affidavits, if any, are to be served upon the undersigned by January 15, 2018, as per the teleconference conducted and subsequent Order dated September 5, 2017.

Dated: New York, New York
       December 13, 2017

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